

HEARING DATE AND TIME: March 1, 2011 at 9:45 a.m. (Eastern Time)
OBJECTIONS DEADLINE: February 22, 2011 at 4:00 p.m. (Eastern Time)

Kathleen H. Klaus
MADDIN HAUSER WARTELL,
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Attorneys for Creditor, M-Tech Associates, LLC.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re : Chapter 11 Case No.
MOTORS LIQUIDATION COMPANY, et al., : 09-50025 (REG)
f/k/a General Motors Corp., et al. : (Jointly Administered)
Debtors. :
-----X

**MTECH ASSOCIATES, LLC'S LIMITED OBJECTION TO THE MOTION OF
DEBTORS FOR ENTRY OF AN ORDER ESTIMATING MAXIMUM AMOUNT
OF CERTAIN CLAIMS FOR PURPOSES OF ESTABLISHING CLAIMS
RESERVES UNDER THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN**

MTech Associates, LLC ("MTech") objects to the Debtors' estimate of MTech's general unsecured claim because the estimated amount does not include MTech's separately-filed administrative expense claim. Approving the Debtors' estimate would bar MTech from asserting part of its administrative expense claim as a general, unsecured claim, should any portion of the administrative expense claim be deemed a general, unsecured claim. MTech has provided the Debtors with evidence supporting each element of both of its claims, and, other than asking for such information, Debtors have

made no effort to resolve MTech's claims. MTech therefore asks that the estimate of its general unsecured claim be set at \$6,814,123.62 rather than \$6,051,597.62.

Dated: February 18, 2011

/s/ *Kathleen H. Klaus*

Kathleen H. Klaus

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Debtors. :
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PROOF OF SERVICE

STATE OF MICHIGAN)
)SS
COUNTY OF OAKLAND)

Kathleen H. Klaus, being first duly sworn, deposes and states that on the 18th day of February, 2011 she mailed via federal express a copy of:

MTECH ASSOCIATES, LLC'S LIMITED OBJECTION TO THE MOTION OF DEBTORS FOR ENTRY OF AN ORDER ESTIMATING MAXIMUM AMOUNT OF CERTAIN CLAIMS FOR PURPOSES OF ESTABLISHING CLAIMS RESERVES UNDER THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN, along with this Proof of Service upon the following counsel as noted:

(i) Weil, Gotshal & Manges LLP,

attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 401 South Old Woodward Avenue, Suite 370, Birmingham, Michigan 48009 (Attn: Thomas Morrow); (iii) General Motors LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafel in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.)

/s/ Kathleen H. Klaus
Kathleen H. Klaus